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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****PHILIP GODLEWSKI,**

Plaintiff,

v.

**EDUARDO NICOLAS ALVEAR
GONZALEZ, *AKA* ALVEAR GONZALEZ
EDUARDO NICOLAS, *AKA*
NICOLAS ALVEAR; and
GOOD LION TV, LLC,**

Defendants

**CIVIL ACTION—LAW & EQUITY
(*HON. JULIA K. MUNLEY*)****JURY TRIAL DEMANDED**

No.: 3:24—CV—00344

**DEFENDANTS' MOTION FOR AUTHORIZATION TO FILE BRIEF
NOT TO EXCEED 8,500 WORDS PURSUANT TO LOCAL RULE 7.8(b)(3)**

AND NOW COME Defendants, Eduardo Nicolas Alvear Gonzalez, *aka* Alvear Gonzalez Eduardo Nicolas, *aka* Nicolas Alvear (collectively, "Individual Defendant") and Good Lion TV, LLC ("Corporate Defendant"), by and through their counsel, Rothenberg & Campbell, and hereby moves this Honorable Court to authorize them to file a Brief in Support of their Motion to Dismiss Not to Exceed 8,500 words pursuant to Local Rule 7.8(b)(3), alleging as follows:

1. Plaintiff commenced the instant action by filing a Complaint against Defendants in the United States District Court for the Middle District of Pennsylvania on February 28, 2024. (See ECF Doc. No. 2).
2. Without waiving the right to challenge proper service of process and for purposes of the instant Motion, Plaintiff alleges that Individual Defendant and Corporate Defendant were each served with the Summons and Complaint on March 5, 2024 by process server. (See ECF Doc. No. 9 at ¶2).
3. On March 27, 2024, undersigned counsel entered his appearance for Individual Defendant and Corporate Defendant, having just been retained earlier that day by Defendants. (See ECF Doc. No. 11).
4. On March 29, 2024, this Honorable Court granted Defendants' Motion to Extend Time to File Response to Plaintiff's Complaint. (See ECF Doc. No. 15).
5. On April 4, 2024, Defendants filed their First Motion to Dismiss Plaintiff's Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6). (See ECF Doc. No. 16).
6. Defendants' Motion to Dismiss includes grounds for lack of personal jurisdiction (Rule 12(b)(2)), failure to state a claim upon which relief can be granted on each of Plaintiff's quinary state-law tort claims (Rule 12(b)(6)), and, alternatively, motion to strike (Rule 12(f)).
7. As of the date of this Motion, Defendants' Brief in Support of their First Motion to Dismiss exceeds the word limit announced in Local Rule 7.8(b) with its current draft containing just under 10,000 words.

8. Defendants seek authorization from this Honorable Court pursuant to Local Rule 7.8(b)(2) to file their Brief in Support of Motion to Dismiss with a word count not to exceed 8,500 words.

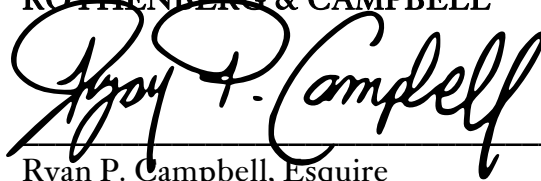
9. On April 8, 2024, Defendants' undersigned counsel contacted counsel for Plaintiff seeking concurrence in the instant motion for prior authorization to file their brief with a word count not to exceed 8,500 words; Plaintiff's counsel later concurred in his request.

WHEREFORE, for all of the reasons stated supra, Defendants, Eduardo Nicolas Alvear Gonzalez, *aka* Alvear Gonzalez Eduardo Nicolas, *aka* Nicolas Alvear, and Good Lion TV, LLC, by and through undersigned counsel, respectfully request that this Honorable Court **GRANT** their Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to Local Rule 7.8(b)(2).

Respectfully Submitted,

ROTHENBERG & CAMPBELL

By:

A handwritten signature in black ink, appearing to read "Ryan P. Campbell", written over a horizontal line.

Ryan P. Campbell, Esquire
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ATTORNEYS FOR DEFENDANTS

Date: April 9, 2024

ROTHENBERG & CAMPBELL

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CERTIFICATE OF CONCURRENCE

I, Ryan P. Campbell, Esquire, on behalf of Defendants, do hereby certify that I sought concurrence in Defendants' Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to Local Rule 7.8(b)(2) to Plaintiff's counsel, Timothy M. Kolman, Esq. by e-mail on April 8, 2024 and that Plaintiff's counsel has no objection to the instant motion.

BY: **ROTHENBERG & CAMPBELL**

Ryan P. Campbell, Esquire

ATTORNEYS FOR DEFENDANTSDate: April 9, 2024

ROTHENBERG & CAMPBELL

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CERTIFICATE OF SERVICE

I, Ryan P. Campbell, Esquire, on behalf of Defendants, do hereby certify that I sent a true and accurate copy of Defendants' Motion to Extend Deadlines in the above-captioned case on this **9th day of April, 2024** to the below named individuals by ECF and Electronic Mail addressed as follows:

Timothy M. Kolman, Esq.

e. tkolman@kolmanlaw.com**ATTORNEYS FOR PLAINTIFF**BY: **ROTHENBERG & CAMPBELL**

Ryan P. Campbell, Esquire

ATTORNEYS FOR DEFENDANTS**DATE: APRIL 9, 2024**

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PHILIP GODLEWSKI, v. EDUARDO NICOLAS ALVEAR GONZALEZ, <i>AKA</i> ALVEAR GONZALEZ EDUARDO NICOLAS, <i>AKA</i> NICOLAS ALVEAR; and GOOD LION TV, LLC,	<div>Plaintiff,</div> <div>Defendants</div>	<div>CIVIL ACTION—LAW & EQUITY <i>(HON. JULIA K. MUNLEY)</i></div> <div>JURY TRIAL DEMANDED</div> <div>No.: 3:24—CV—00344</div>
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ORDER

AND NOW, this ____ day of **APRIL, 2024**, upon consideration of Defendants’ Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to Local Rule 7.8(b)(2), unopposed by Plaintiff, it is hereby **ORDERED** and **DECREED** that Defendants’ Motion is **GRANTED**.

IT IS HEREBY ORDERED that Defendants shall be authorized to file their Brief in Support of Motion to Dismiss Plaintiff’s Complaint Or, Motion to Strike exceeding the maximum word limits outlined in Local Rule 7.8(b), but not to exceed 8,500 words.

BY THE COURT:

HON. JULIA K. MUNLEY, J.